

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

| | | |
|---------------------------|---|------------------------------|
| UNITED STATES OF AMERICA, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | Case No: 4:23-cr-274-RWS-JSD |
| |) | |
| MACE ANTHONY NOSOVITCH, |) | |
| |) | |
| Defendant. |) | |

**MOTION FOR LEAVE FOR COURT ORDER TO THE UNITED STATES
MARSHALS SERVICE**

Defendant Mace Nosovitch, by and through counsel, moves this Court for leave for an Order directing the United States Marshals Service to bring Mr. Nosovitch's pocket dictionary to the June 10 evidentiary hearing. In support of this motion, Defendant states as follows:

1. Defendant is a stroke victim.
2. Defendant's stroke has left him with aphasia.
3. Aphasia substantially impairs Defendant's capacity to communicate by and comprehend language.
4. At the jail where he is housed, Defendant uses a pocket dictionary to accommodate his communicative deficits.
5. The pocket dictionary will help Defendant accommodate his deficits at the impending evidentiary hearing.
6. Defendant is disabled within the meaning of the Americans with Disabilities Act and is therefore entitled to reasonable accommodations provided by the court to ensure he receives a meaningful opportunity to participate in his proceedings.
7. The pocket dictionary is a reasonable accommodation that will help ensure that

Defendant receives this opportunity.

WHEREFORE, Defendant respectfully requests this Court issue an Order directing the United States Marshals Service to bring his pocket dictionary to the June 10 evidentiary hearing

Respectfully submitted,

/s/ Adam Fein

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CERTIFICATE OF SERVICE

I hereby certify that on June 3, 2025, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Ms. Catherin Hoag and Ms. Jennifer Szczucinski, Assistant United States Attorneys.